IN THE UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF PENNSYLVANIA

JONI WRIGHT, individually and on behalf of all others similarly situated,

: Civil Action No.: 10-431 (ACR)

Plaintiffs,

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v.

LEHIGH VALLEY HOSPITAL AND HEALTH NETWORK, LEHIGH VALLEY HOSPITAL, LEHIGH VALLEY HOSPITAL – MUHLENBERG, LEHIGH VALLEY HOSPITAL – 17TH STREET, AND LEHIGH VALLEY HOSPITAL – CEDAR CREST,

Defendants.

MOTION OF PLAINTIFFS FOR AN ORDER CERTIFYING THE SETTLEMENT CLASS, GRANTING ENHANCEMENT PAYMENTS AND SERVICE PAYMENTS, AND <u>APPROVING THE SETTLEMENT AGREEMENT</u>

Class Representatives Joni Wright and Lenia Rexrode, individually and on behalf of all non-exempt registered nurses employed by Defendants in the Patient Care Services Division from January 20, 2008 through May 18, 2012, who were allegedly not compensated for all time worked, by and through their undersigned counsel of record, hereby move before this Honorable Court for an Order:

- 1. Granting Final Approval of the Joint Stipulation of Settlement and Release entered into between Plaintiffs and Defendants, Lehigh Valley Hospital and Health Network, Lehigh Valley Hospital, Lehigh Valley Hospital Muhlenberg, Lehigh Valley Hospital 17th Street, and Lehigh Valley Hospital Cedar Crest ("LVHN" or "Defendants"),;
 - 2. Certifying the Settlement Class;
 - 3. Granting Enhancement Payments to the Class Representatives; and

4. Granting Service Payments to the Opt-In Plaintiffs and Deponent Opt-In Plaintiffs.

Plaintiffs' arguments in support of this Motion are more fully explained in the accompanying Memorandum of Law and attached exhibits, which are incorporated into this Motion by reference.

SOBOL, SOBOL & MURPHY, P.C.

By: s/ Michael Murphy

Michael Murphy, Esquire Martin J. Sobol, Esquire Daniel J. Sobol, Esquire 1760 Market Street, Suite 1200 Philadelphia, PA 19103 (215) 988-0193

Fax: (215) 988-0193

Dated: July 9, 2012

CERTIFICATE OF SERVICE

I, Michael Murphy, Esquire, hereby certify that on July 9, 2012, I caused a true and correct copy of the foregoing to be filed via ECF filing, which will send notification of such filing to the following counsel:

A. James Johnston, Esquire Post & Schell, P.C. Four Penn Center 1600 John F. Kennedy Blvd. Philadelphia, PA 19103

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Glenn Guanowsky, Esquire General Counsel Lehigh Valley Hospital and Health Network (Mailing Address Unknown)

> /s/ Michael Murphy Michael Murphy

Dated: July 9, 2012